

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**STATE OF OHIO, ex rel.
ATTORNEY GENERAL DAVE YOST**

Plaintiffs,

v.

AARON MICHAEL JONES, et al.

Defendants.

Civil Action No. 2:22-cv-2700
Chief Judge Algenon L. Marbley
Magistrate Judge Kimberly A. Jolson

MOTION REQUESTING ISSUANCE OF LETTERS ROGATORY

Plaintiff State of Ohio files this motion requesting the issuance of letters rogatory directed to the Panamanian Central Authority to serve the Summons and Complaint upon Defendants Jovita Migdaris Cedeno Luna, Livia Szuromi, Technologic, Inc., Davis Telecom, Inc., and Sumco Panama SA pursuant to the Inter-American Convention on Letters Rogatory and the Additional Protocol Convention under Civ. Rule 4(f)(1) and (h)(2). The proposed letters rogatory are attached as exhibits.

Respectfully Submitted,

s/ Erin B. Leahy

ERIN B. LEAHY, Trial Attorney

Ohio Bar No. 69509

Erin.Leahy@OhioAgo.gov

Senior Assistant Attorney General

Ohio Attorney General's Office

Consumer Protection Section

30 E. Broad Street, 14th Floor

Columbus, Ohio 43215

(614) 752-4730 (Leahy)

Certificate of Service

Pursuant to FEDERAL RULE OF CIVIL PROCEDURE 5(a), I hereby certify that on December 23, 2022, a true and correct copy of the above and foregoing document has been served using the CM/ECF system to all counsel of record and via electronic mail the following:

JUSTIN WHITTAKER, Esq., Trial Attorney
OH Bar No. 93212
Whittaker Law, LLC
513.259.3758 (m) | 513.436.0689 (f)
justin@whittakerlawfirm.com
1431 Walnut Street,
Cincinnati Ohio 45202
Counsel for Defendants Roy Cox and Julie Bridge

M. CANDICE CROSBY, Esq.
CA 192462, Pro Hac Vice
BRYNER CROSBY, APC
24361 El Toro Road, Suite 220
Laguna Hills, California 92637
Tel: (949) 371-9056
Fax: (949) 656-7380
Candice@BrynerLaw.com
Counsel for Defendants Roy Cox and Julie Bridge

JUNE ANN BATISTA
junesells@yahoo.com
Defendant, Pro Se

VINCENT A. STAFFORD
Stafford Law
VAS@Stafford-Stafford.com
Courtesy copy on behalf of Pro Se Defendant June Batista

/s/ Erin B. Leahy
ERIN B. LEAHY
ASSISTANT ATTORNEY GENERAL